

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In Re:)	
)	Chapter 11
THE KRYSTAL COMPANY, <i>et al.</i> ¹)	
)	Case No. 20-61065-pwb
_____ Debtors.)	(jointly administered)

GEORGIA POWER COMPANY’S OBJECTION TO PROPOSED CURE AMOUNTS

Georgia Power Company (“GPC”) hereby objects to the proposed cure amounts listed in the Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases filed on April 7, 2020 at Docket 310 (the “Cure Notice”) by The Krystal Company, Krystal Holdings, Inc. and K-Square Acquisition Co., LLC. (collectively, the “Debtors”), and in support hereof, shows as follows:

1. The Debtors filed chapter 11 petitions on January 19, 2020 (the “Petition Date”).
2. The Cure Notice was filed in conjunction with an ongoing process to sell substantially all the Debtors’ assets.
3. The Cure Notice identifies multiple lighting lease agreements with GPC (collectively, the “Lighting Agreements”).
4. In the Cure Notice, the Debtors inaccurately indicate that the cure amount is zero for each of the Lighting Agreements.
5. The actual cure amounts are provided in the table attached hereto as Exhibit A (the “Cure Amounts Table”). They are broken down between amounts owed prior to the Petition Date and amounts owed after the Petition Date.
6. The aggregate amount owed under the Lighting Agreements for the period of time prior to the Petition Date is \$92,856.94.² The aggregate amount currently owed under the

¹ The Debtors in these chapter 11 cases include: The Krystal Company, Krystal Holdings, Inc. and K-Square Acquisition Co., LLC.

² The amounts comprising this figure are also included and detailed in GPC’s filed proof of claim.

Lighting Agreements for the period of time after to the Petition Date is \$49,130.00. Thus, the total amount owed under the Lighting Agreements is \$141,987.05. The underlying documents supporting these figures such as the Lighting Agreements and related account histories are voluminous, and therefore, they are not attached to this Objection. However, those additional documents are available upon request.

7. Further, one of the Lighting Agreements identified by the Debtors as having GPC as a counterparty is actually an agreement with Alabama Power Company as the counterparty. Such agreement is identified as such in the Comments column in the Cure Amounts Table.

8. Lastly, some of the Lighting Agreements listed in the Cure Notice may have been terminated prior to the Petition Date. Such Lighting Agreements are identified as falling into that category in the Comments column in the Cure Amounts Table. At this time, GPC is not taking any position the issue of whether such Lighting Agreements have been terminated or whether they could, under Bankruptcy Code Section 365 or otherwise, be assumed and assigned to a purchaser of the Debtors' assets. However, if such Lighting Agreements are ultimately assumed and assigned to a purchaser, through consent of GPC, order of the Court or otherwise, the actual cure amounts are provided in the Cure Amounts Table.

9. GPC reserves all rights with respect to the treatment of the Lighting Agreements in these bankruptcy cases, including without limitation, the right to seek additional cure amounts that may accrue and/or come due before the closing of a sale of the Debtors' assets.

This 27th day of April, 2020.

/s/ Thomas R. Walker
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Counsel for Georgia Power Company

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing ***Georgia Power Company's Objection to Proposed Cure Amounts*** using the Bankruptcy Court's Electronic Case Filing program (the "ECF Program"), which sends a notice of and an accompanying link to this document to all parties who have appeared in this case under the ECF Program.

This 27th day of April, 2020.

/s/ Thomas R. Walker
Thomas R. Walker
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Counsel for Georgia Power Company

Exhibit A
(Cure Amounts Table)

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
3/9/2015	Governmental Customer Conversion NEC Lease Agreement - 626 14th Street, Atlanta, GA 30318	\$0.00	\$213.57	\$0.00	\$213.57	
3/16/2015	Lighting Services Customer Conversion NEC Lease Agreement - 111 N Morningside Drive, Cartersville, GA 30120	\$0.00	\$496.32	\$372.24	\$868.56	
4/3/2015	Lighting Services Customer Conversion NEC Lease Agreement - 1140 Gray Hwy, Macon, GA 31211	\$0.00	\$2,809.60	\$2,469.88	\$5,279.48	
4/15/2015	Lighting Services Customer Conversion NEC Lease Agreement - 1415 Sam Nunn Blvd, Perry, GA 31069	\$0.00	\$2,270.37	\$0.00	\$2,270.37	May have been terminated prepetition
4/3/2015	Lighting Services Customer Conversion NEC Lease Agreement - 1638 Watson Blvd, Warner Robins, GA 31093	\$0.00	\$327.64	\$307.16	\$634.80	
3/16/2015	Lighting Services Customer Conversion NEC Lease Agreement - 1704 Turner McCall Blvd, Rome, GA 30161	\$0.00	\$88.58	\$63.55	\$152.13	
4/3/2015	Lighting Services Customer Conversion NEC Lease Agreement - 1884 N Columbia St, Milledgeville, GA 31061	\$0.00	\$0.00	\$0.00	\$0.00	May have been terminated prepetition

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
4/1/2015	Lighting Services Customer Conversion NEC Lease Agreement - 1909 East Walnut Avenue, Dalton, GA 30720	\$0.00	\$240.40	\$232.65	\$473.05	
3/20/2015	Lighting Services Customer Conversion NEC Lease Agreement - 2484 Highway 79, Snellville, GA 30078	\$0.00	\$0.00	\$0.00	\$0.00	May have been terminated prepetition
3/23/2015	Lighting Services Customer Conversion NEC Lease Agreement - 2509 North Main Street, East Point, GA 30344	\$0.00	\$384.00	\$0.00	\$384.00	
3/30/2015	Lighting Services Customer Conversion NEC Lease Agreement - 2560 Lafayette Rd, Ft Oglethorpe, GA 30742	\$0.00	\$418.77	\$0.00	\$418.77	May have been terminated prepetition
3/20/2015	Lighting Services Customer Conversion NEC Lease Agreement - 271 S Cobb Parkway, Marietta , GA 30062	\$0.00	\$402.01	\$0.00	\$402.01	May have been terminated prepetition
4/3/2015	Lighting Services Customer Conversion NEC Lease Agreement - 2863 Pio Nino Ave, Macon, GA 31206	\$0.00	\$333.49	\$0.00	\$333.49	May have been terminated prepetition
4/15/2015	Lighting Services Customer Conversion NEC Lease Agreement - 301 West Waugh St, Dalton, GA 30720	\$0.00	\$761.49	\$585.76	\$1,347.25	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
3/20/2015	Lighting Services Customer Conversion NEC Lease Agreement - 3230 Highway 278, Covington, GA 30014	\$0.00	\$400.35	\$363.96	\$764.31	
3/11/2016	Lighting Services Customer Conversion NEC Lease Agreement - 3650 Riverside Dr, Macon, GA 31707	\$0.00	\$1,325.53	\$0.00	\$1,325.53	
10/23/2015	Lighting Services Customer Conversion NEC Lease Agreement - 412 13th Street, Columbus, GA 31907	\$0.00	\$600.24	\$0.00	\$600.24	
3/24/2015	Lighting Services Customer Conversion NEC Lease Agreement - 4644 Jonesboro Rd, Union City, GA 30291	\$0.00	\$339.19	\$0.00	\$339.19	
3/30/2015	Lighting Services Customer Conversion NEC Lease Agreement - 5071 Highway 136 W, Trenton, GA 30752	\$0.00	\$653.19	\$0.00	\$653.19	
3/20/2015	Lighting Services Customer Conversion NEC Lease Agreement - 5140 S Cobb Drive, Smyrna, GA 30082	\$0.00	\$1,381.53	\$0.00	\$1,381.53	
3/20/2015	Lighting Services Customer Conversion NEC Lease Agreement - 5181 Highway 78, Stone Mountain, GA 30291	\$0.00	\$285.38	\$0.00	\$285.38	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
3/16/2015	Lighting Services Customer Conversion NEC Lease Agreement - 519 Shorter Avenue, Rome, GA 30161	\$0.00	\$2,562.45	\$0.00	\$2,562.45	
3/11/2015	Lighting Services Customer Conversion NEC Lease Agreement - 5235 Old National Hwy, College Park, GA 30349	\$0.00	\$304.00	\$0.00	\$304.00	
4/1/2015	Lighting Services Customer Conversion NEC Lease Agreement - 5703 Alabama Hwy., Ringgold, GA 30736	\$0.00	\$315.94	\$263.28	\$579.22	
11/19/2015	Lighting Services Customer Conversion NEC Lease Agreement - 607 East Martintown Rd, N Augusta, SC 29841	\$0.00	\$0.00	\$0.00	\$0.00	May have been terminated prepetition
4/3/2015	Lighting Services Customer Conversion NEC Lease Agreement - 6225 Zebulon Rd, Macon, GA 31210	\$0.00	\$1,888.58	\$1,874.57	\$3,763.15	
3/16/2015	Lighting Services Customer Conversion NEC Lease Agreement - 623 N Main Street, Cedartown, GA 30125	\$0.00	\$1,270.01	\$0.00	\$1,270.01	
3/16/2015	Lighting Services Customer Conversion NEC Lease Agreement - 652 Hwy 53 East SE, Calhoun, GA 30701	\$0.00	\$409.46	\$372.24	\$781.70	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
4/20/2015	Lighting Services Customer Conversion NEC Lease Agreement - 713 W Oglethorpe Blvd, Albany, GA 31701	\$0.00	\$376.88	\$376.88	\$753.76	
4/16/2015	Lighting Services Customer Conversion NEC Lease Agreement - 747 Russell Pkwy, Warner Robins, GA 31099	\$0.00	\$328.00	\$0.00	\$328.00	May have been terminated prepetition
4/3/2015	Lighting Services Customer Conversion NEC Lease Agreement - 892 Riverside Dr, Macon, GA 31201	\$0.00	\$100.50	\$0.00	\$100.50	
10/26/2015	Lighting Services Customer Conversion NEC Lease Agreement - 90 Scranton Connector, Brunswick, GA 31525	\$0.00	\$0.00	\$0.00	\$0.00	May have been terminated prepetition
8/5/2016	Lighting Services NEC Lease Agreement - 101 Tanger Outlet Blvd, Pooler, GA 31322	\$0.00	\$216.71	\$0.00	\$216.71	May have been terminated prepetition
3/30/2015	Lighting Services NEC Lease Agreement - 1015 East Hwy 80, Pooler, GA 31322	\$0.00	\$2,814.62	\$0.00	\$2,814.62	
4/1/2015	Lighting Services NEC Lease Agreement - 102 Tripp St, Americus, GA 31709	\$0.00	\$0.00	\$0.00	\$0.00	May have been terminated prepetition
3/15/2015	Lighting Services NEC Lease Agreement - 1055 Holcomb Bridge Rd, Roswell, GA 30076	\$0.00	\$2,308.57	\$2,407.10	\$4,715.67	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
4/12/2017	Lighting Services NEC Lease Agreement - 1071 GA Highway 96, Warner Robins, GA 31088	\$0.00	\$329.00	\$282.00	\$611.00	
4/2/2015	Lighting Services NEC Lease Agreement - 1205 St. Augustine Rd, Valdosta, GA 31601	\$0.00	\$2,127.74	\$2,074.05	\$4,201.79	
3/31/2015	Lighting Services NEC Lease Agreement - 14020 Abercorn St, Savannah, GA 31419	\$0.00	\$880.84	\$905.82	\$1,786.66	
3/30/2015	Lighting Services NEC Lease Agreement - 1555 Walton Way, Augusta, GA 30904	\$0.00	\$1,972.45	\$2,015.65	\$3,988.10	
4/20/2015	Lighting Services NEC Lease Agreement - 1605 North Slappey Blvd, Albany , GA 31701	\$0.00	\$263.28	\$263.28	\$526.56	
4/2/2015	Lighting Services NEC Lease Agreement - 1815 East 16th Avenue, Cordele, GA 31015	\$0.00	\$188.44	\$0.00	\$188.44	
1/19/2016	Lighting Services NEC Lease Agreement - 185 Lakepoint Pkwy, Emerson, GA	\$0.00	\$0.00	\$0.00	\$0.00	May have been terminated prepetition

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
9/4/2015	Lighting Services NEC Lease Agreement - 2419 Acton Rd, Birmingham, AL 35243	\$0.00	\$0.00	\$0.00	\$0.00	Alabama Power Company agreement (cure amounts listed as zero to make formulas work, but we are taking no position on behalf of Alabama Power Company)
3/30/2015	Lighting Services NEC Lease Agreement - 2537 Peach Orchard Road, Augusta, GA 30906	\$0.00	\$282.66	\$282.66	\$565.32	
4/20/2015	Lighting Services NEC Lease Agreement - 2621 Dawson Road, Albany , GA 31707	\$0.00	\$326.27	\$0.00	\$326.27	
7/8/2016	Lighting Services NEC Lease Agreement - 2740 Hamilton Mill Rd, Buford, GA 30519	\$0.00	\$25.13	\$0.00	\$25.13	May have been terminated prepetition
3/30/2015	Lighting Services NEC Lease Agreement - 2804 Bee Rd, Savannah, GA 31401	\$0.00	\$376.88	\$376.88	\$753.76	
6/8/2016	Lighting Services NEC Lease Agreement - 300 Georgia Highway 49N, Byron, GA 31008	\$0.00	\$116.29	\$300.00	\$416.29	
4/15/2015	Lighting Services NEC Lease Agreement - 3029 Manchester Expressway , Columbus, GA 31909	\$0.00	\$2,664.26	\$498.08	\$3,162.34	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
3/11/2016	Lighting Services NEC Lease Agreement - 30605 Hwy 441 South, Commerce, GA 30529	\$0.00	\$590.53	\$0.00	\$590.53	
3/30/2015	Lighting Services NEC Lease Agreement - 3403 Wrightsboro Rd, Augusta, GA 30909	\$0.00	\$2,095.15	\$0.00	\$2,095.15	May have been terminated prepetition
4/1/2015	Lighting Services NEC Lease Agreement - 3446 Victory Drive, Columbus, GA 31903	\$0.00	\$251.25	\$0.00	\$251.25	
4/10/2015	Lighting Services NEC Lease Agreement - 349 Cleveland Ave, Atlanta, GA 30315	\$0.00	\$301.50	\$0.00	\$301.50	
3/30/2015	Lighting Services NEC Lease Agreement - 468 South Columbia Ave, Rincon, GA 31326	\$0.00	\$1,895.49	\$2,309.94	\$4,205.43	
3/30/2015	Lighting Services NEC Lease Agreement - 4814 Augusta Rd, Garden City, GA 31408	\$0.00	\$226.13	\$329.86	\$555.99	
4/15/2015	Lighting Services NEC Lease Agreement - 4823 Buena Vista Rd, Columbus, GA 31907	\$0.00	\$3,025.75	\$2,230.99	\$5,256.74	
3/20/2015	Lighting Services NEC Lease Agreement - 509 West Taylor St, Griffin, GA 30223	\$0.00	\$0.00	\$376.88	\$376.88	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
3/30/2015	Lighting Services NEC Lease Agreement - 5405 Abercorn Street, Savannah, GA 31405	\$0.00	\$3,394.06	\$2,282.81	\$5,676.87	
4/15/2015	Lighting Services NEC Lease Agreement - 5412 Veterans Parkway, Columbus, GA 31904	\$0.00	\$2,208.85	\$2,113.20	\$4,322.05	
4/16/2015	Lighting Services NEC Lease Agreement - 5716 Fairburn Rd, Douglasville, GA 30134	\$0.00	\$803.14	\$634.06	\$1,437.20	
3/20/2015	Lighting Services NEC Lease Agreement - 6155 Highway 141, Norcross, GA 30017	\$0.00	\$2,250.82	\$1,912.26	\$4,163.08	
4/3/2015	Lighting Services NEC Lease Agreement - 65 Tourist Dr, Brunswick, GA 31520	\$0.00	\$201.00	\$0.00	\$201.00	
4/7/2015	Lighting Services NEC Lease Agreement - 781 Brannen Rd, Statesboro, GA 30458	\$0.00	\$2,996.29	\$0.00	\$2,996.29	
4/2/2015	Lighting Services NEC Lease Agreement - 815 West Second Street, Tifton, GA 31794	\$0.00	\$339.19	\$376.88	\$716.07	
3/30/2015	Lighting Services NESC Lease Agreement - 10003 Abercorn Street, Savannah, GA 31406	\$0.00	\$2,406.46	\$2,568.55	\$4,975.01	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
3/9/2015	Lighting Services NESC Lease Agreement - 10457 Tara Blvd, Jonesboro, GA 30236	\$0.00	\$203.60	\$0.00	\$203.60	May have been terminated prepetition
3/16/2015	Lighting Services NESC Lease Agreement - 1109 Maple Street, Carrollton, GA 30117	\$0.00	\$286.01	\$0.00	\$286.01	May have been terminated prepetition
3/11/2020	Lighting Services NESC Lease Agreement - 1447 Highway 138, Conyers, GA 30012	\$0.00	\$2,215.43	\$2,009.18	\$4,224.61	
3/16/2015	Lighting Services NESC Lease Agreement - 1704 Turner McCall Blvd, Rome, GA 30161	\$0.00	\$88.58	\$63.55	\$152.13	
3/20/2015	Lighting Services NESC Lease Agreement - 1855 Candler Rd, Decatur, GA 30032	\$0.00	\$1,890.24	\$1,944.30	\$3,834.54	
4/1/2015	Lighting Services NESC Lease Agreement - 1909 East Walnut Avenue, Dalton, GA 30720	\$0.00	\$240.40	\$232.65	\$473.05	
3/20/2015	Lighting Services NESC Lease Agreement - 2068 N Druid Hills Rd NE, Atlanta, GA 30329	\$0.00	\$587.29	\$0.00	\$587.29	
3/20/2015	Lighting Services NESC Lease Agreement - 2223 Lawrenceville Hwy, Decatur, GA 30033	\$0.00	\$2,540.26	\$2,233.89	\$4,774.15	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
3/30/2015	Lighting Services NESC Lease Agreement - 2537 Peach Orchard Road, Augusta, GA 30906	\$0.00	\$2,261.32	\$2,142.15	\$4,403.47	
4/3/2015	Lighting Services NESC Lease Agreement - 2863 Pio Nino Ave, Macon, GA 31206	\$0.00	\$333.49	\$0.00	\$333.49	May have been terminated prepetition
3/18/2015	Lighting Services NESC Lease Agreement - 2890 Evans Mill Road, Lithonia , GA 30038	\$0.00	\$2,373.42	\$2,003.75	\$4,377.17	
3/20/2015	Lighting Services NESC Lease Agreement - 2929 Canton Rd, Marietta, GA 30066	\$0.00	\$1,190.19	\$1,054.02	\$2,244.21	
6/24/2015	Lighting Services NESC Lease Agreement - 300 Georgia Highway 49N, Byron, GA 31008	\$0.00	\$3,141.09	\$2,048.52	\$5,189.61	
3/20/2015	Lighting Services NESC Lease Agreement - 3037 Piedmont Rd, Atlanta , GA 30305	\$0.00	\$614.80	\$636.74	\$1,251.54	
4/1/2015	Lighting Services NESC Lease Agreement - 3446 Victory Drive, Columbus, GA 31903	\$0.00	\$251.25	\$0.00	\$251.25	
4/13/2015	Lighting Services NESC Lease Agreement - 349 Cleveland Ave, Atlanta, GA 30315	\$0.00	\$301.50	\$282.66	\$584.16	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
3/12/2015	Lighting Services NESC Lease Agreement - 3562 Highway 138 SE, Stockbridge, GA 30281	\$0.00	\$871.13	\$0.00	\$871.13	
4/3/2015	Lighting Services NESC Lease Agreement - 3909 Bloomfield Rd, Macon, GA 31206	\$0.00	\$2,877.81	\$2,325.72	\$5,203.53	
3/20/2015	Lighting Services NESC Lease Agreement - 415 Moreland Ave, Atlanta, GA 30316	\$0.00	\$510.89	\$0.00	\$510.89	
3/30/2015	Lighting Services NESC Lease Agreement - 4814 Augusta Rd, Garden City, GA 31408	\$0.00	\$226.13	\$329.86	\$555.99	
3/9/2015	Lighting Services NESC Lease Agreement - 626 14th Street, Atlanta , GA 30318	\$0.00	\$3,308.80	\$0.00	\$3,308.80	
3/9/2015	Lighting Services NESC Lease Agreement - 6405 Jonesboro Rd, Morrow, GA 30260	\$0.00	\$3,001.01	\$0.00	\$3,001.01	
3/12/2015	Lighting Services NESC Lease Agreement - 6605 Hwy 85, Riverdale , GA 30274	\$0.00	\$1,366.26	\$0.00	\$1,366.26	
3/18/2015	Lighting Services NESC Lease Agreement - 725 Veterans Memorial Hwy SW, Mableton, GA 30126	\$0.00	\$2,237.73	\$0.00	\$2,237.73	

Contract Date	Description	Cure Amount (proposed by Debtor)	Actual Prepetition Cure Amount	Actual Post-petition Cure Amount	Actual Total Cure Amount	Comments
4/3/2015	Lighting Services NESC Lease Agreement - 892 Riverside Dr, Macon, GA 31201	\$0.00	\$100.50	\$0.00	\$100.50	
3/12/2015	Lighting Services NESC Lease Agreement - 939 Highway 155 S, McDonough, GA 30253	\$0.00	\$671.59	\$0.00	\$671.59	
			\$92,856.94 (sum of actual prepetition Cure Amounts)	\$49,130.11 (sum of actual post-petition Cure Amounts)	\$141,987.05 (sum of all prepetition and post- petition Cure Amounts)	